

COUNTY OF SANTA BARBARA  
PUBLIC WORKS DEPARTMENT  
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SCOTT D. MCGOLPIN  
Director

March 1, 2013

California Environmental Protection Agency - Air Resources Board  
  
1001 "I" Street  
  
Sacramento, CA 95814

**Subject: Comment on the Cap-and-Trade Auction Proceeds Investment Plan**

Dear Members and Staff of the California Air Resources Board:

Thank you for giving us the opportunity to comment on the Cap-and-Trade Auction Proceeds Investment Plan. This important plan will determine the course public agencies and private businesses take on establishing greenhouse gas reducing projects across the State in the coming decades.

I am writing this comment letter on behalf of the Resource Recovery & Waste Management Division of the Santa Barbara County Public Works Department. Since the passage of AB 939, our Division has developed and implemented dozens of innovative solid waste diversion projects accomplishing a local diversion rate of over 70%. For the past six years we have been aggressively seeking out alternatives to landfilling. The result of this effort is that we have now begun the environmental review process for our Resource Recovery Project ([www.ResourceRecoveryProject.com](http://www.ResourceRecoveryProject.com)) which proposes the use of anaerobic digestion (AD) for the organic portion of our waste stream.

We would ask that the Board specifically name anaerobic digestion (AD) of municipal solid waste as a preferred project for the Investment Plan. It is clear that the State has taken notice of the overwhelming benefits of AD as a waste management process; as seen through CalRecycle's Anaerobic Digestion Initiative (Strategic Directive 6.1). CalRecycle believes that the implementation of this Initiative will decrease the amount of greenhouse gas (GHG) emissions from landfills by over 2 million metric tons of carbon dioxide equivalent (MTCO2E) gases per year. This does not include additional GHG reductions that can be achieved through the renewable energy AD projects produce in the form of biofuels.

AA /EEO Employer

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Thomas D. Fayram, Deputy Director

Mark Paul, Chief Financial Officer

Chris Sneddon, Deputy Director

Aleksandar Jevremovic, County Surveyor

Mark A. Schleich, Deputy Director

[www.publicworkssb.org](http://www.publicworkssb.org)

CalRecycle has also produced a Statewide Programmatic Environmental Impact Report in order to streamline the environmental review process for AD projects. This EIR notes that AD avoids many of the impacts associated with traditional aerobic composting by being a net energy producer instead of an energy drain, having better odor control, requiring less land, and consuming less water.

As is noted in CalRecycle's Anaerobic Digestion Initiative and documented in research, traditional aerobic composting does not accomplish the level of GHG reductions associated with AD. Furthermore the smaller footprint associated with AD projects makes them more applicable to the Draft Implementation Principles directed by SB 535 and more likely to be built and operated in California's disadvantaged communities.

The environmental benefits of AD are clear and the State is working hard to streamline the permitting of these facilities; all that is needed now is funding. We believe that "Composting Incentives" and "Renewable Energy and Biofuels from Waste" are too broad of terms. We would ask that the Investment Fund explicitly state a preference for AD facilities for funding under "Natural Resources and Solid Waste Diversion" projects.

Thank you again for your efforts in this important project.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Schleich". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mark Schleich

Deputy Director of Public Works